

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

JAMES GHASAR et al.,

Plaintiffs,

v.

Alejandro Amaya, et al.,

Defendants.

Civil Action No. 1:18-cv-1296 (CMH/IDD)

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER AND  
MEMORANDUM OF LAW IN SUPPORT**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and Rule 5(c) of the Local Rules for the United States District Court for the Eastern District of Virginia, Plaintiffs James Ghaisar and Kelara Ghaisar, Defendant Alejandro Amaya, and Defendant Lucas Vinyard, by their counsel, respectfully request that the Court enter the Stipulated Protective Order attached hereto as Exhibit 1. In support of their Joint Motion, Plaintiffs and Defendants provide the following:

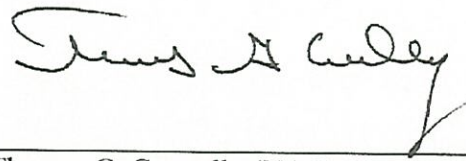
1. Pursuant to Rule 26(c)(2) of the Federal Rules of Civil Procedure, “a party or any person from whom discovery is sought may move for a protective order in the court where the action is pending . . .”
2. Plaintiffs and Defendants, by counsel, have conferred and agreed to the terms of a Stipulated Protective Order governing the parties’ treatment of discovery obtained from non-parties to this action.
3. An endorsed copy of the Stipulated Protective Order is attached hereto as Exhibit 1.

4. Because the parties are jointly moving for the entry of the attached Stipulated Protective Order, a hearing is waived, and the parties therefore have not set this Motion for hearing.

Plaintiffs and Defendants therefore respectfully request that this Court grant their Motion and enter the Stipulated Protective Order into the record for this case.

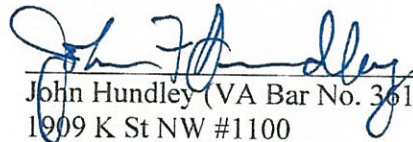
Dated: September 18, 2019

Respectfully submitted,



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